

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

2018 JAN 24 P 12:46
CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA)

v.)

LAQUETTE DARCELL DUNN,)
Defendant.)

CASE No. 1:18-MJ- 36

AFFIDAVIT IN SUPPORT OF A SUMMONS

I. INTRODUCTION

I, Special Agent David Sobeck, of the Pentagon Force Protection Agency, Threat Management Unit, at the Pentagon Reservation in Arlington, Virginia, having been duly sworn, state the following:

1. I am a Special Agent with the Pentagon Force Protection Agency (PFPA) Threat Management Unit. I have been a Special Agent at PFPA for two (2) years. My duties include conducting criminal investigations, threat analysis, law enforcement and security related functions on the Pentagon Reservation. Before joining PFPA, I was a Federal Air Marshal for five (5) years and served as an intelligence specialist in the Marine Corps Reserves for three (3) years.

2. This affidavit is submitted in support of a summons to compel the appearance of LAQUETTE DARCELL DUNN, to answer to the charge that on or about May 26, 2017, on the Pentagon Reservation, within the Special Maritime and Territorial Jurisdiction of the United States, in the Eastern District of Virginia, she did knowingly, intentionally and unlawfully steal and convert to her use and gain, a Government VISA travel credit card, issued by Citibank, that she used to charge goods and services between May 26, 2017, and May 28, 2017, with an

aggregate total value of \$366.12, in violation of Title 18 CFR §641.

3. I personally investigated the violation described below. I learned the facts set forth below from my own investigation and interviews, and from other law enforcement personnel and witnesses cited below. This affidavit includes only the information necessary to support probable cause for a summons to be issued. It does not include each and every fact known to me or the government.

II. THE NATURE OF THE OFFENSE

4. On Monday, Memorial Day, May 29, 2017, Navy LCDR Jennifer J. Franco contacted the Pentagon Police to report that she had been alerted by Citibank, the financial institution that issued her Government VISA travel credit card, concerning possible fraudulent and suspicious charges to her card over the previous weekend. After attempting unsuccessfully to locate her card, she told Police that she had left it on her desk in Pentagon Room 4B514 before leaving work the previous Friday, May 26, 2017. The Pentagon Police, in turn, notified Special Agent William Stull of the PFPA Threat Management Unit who opened an investigation.

5. Pentagon Room 4B514 is a secure workspace within the Pentagon which requires special access privileges and a common-access card (CAC) or escort to enter. There is only one entrance to the room which is secured by a magnetic lock, as well as a cypher lock outside of normal work hours.

6. On May 29, 2017, Special Agent Stull retrieved the "swipe access" records for Room 4B514, from the Pentagon Operation Center (POC), and identified all personnel that had accessed Pentagon Room 4B514 on Friday, May 26, 2017. Stull also collected photographs of all personnel who had access to Pentagon 4B514 on May 26, 2017.

7. On June 2, 2017, Special Agent Stull obtained a transactions log for LCDR Franco's

Government VISA travel credit card from Gabriella Garcia of Citibank Security and Investigative Services. The Transactions log confirmed that seven (7) charges totaling \$366.12 were successfully processed between Friday, May 26, 2017, and Sunday, May 28, 2017. There was also an unsuccessful attempt to use the card at Target which was declined.

8. Special Agent Stull contacted all of the stores where LCDR Franco's card had been presented and requested any and all photographic, videotape and/or other evidence related to the unauthorized charges.

9. According to the transactions log, the first unauthorized transaction involving LCDR Franco's card occurred at 4:44 pm on Friday, May 26, 2017, where a purchase in the amount of \$143.30 was made at Shoppers Food and Pharmacy located at 6200 Little River Turnpike, Alexandria, Virginia 22312.

10. On June, 8, 2017, Gary Jameson, Director of Loss Prevention for Shoppers Food and Pharmacy, provided Special Agent Stull with video, photographic, and documentary evidence of the fraudulent purchase at Shoppers.

11. The second unauthorized transaction occurred at 3:57 pm on Saturday, May 27, 2017, where a \$1.00 charge was placed at PG Fuel located at 7703 Annapolis Road, Lanham, Maryland 20706. Special Agent Stull and I confirmed that there was no videotape evidence available from that location.

12. The third unauthorized transaction occurred at 6:08 pm on Saturday, May 27, 2017, where a \$113.64 purchase was made at Giant Food, located at 1163 Route 3 North, Gambrills, Maryland 21054.

13. On June 2, 2017, Special Agent Stull and I met with Thuan Trinh, General Manager of Giant and reviewed the videotape evidence of the transaction, which appeared to show a black

female, wearing a green camouflaged T-shirt making the purchase. A copy of the transaction was obtained from store management.

14. The fourth unauthorized transaction occurred at 6:15 pm on Saturday, May 27, 2017, where a purchase in the amount of \$92.09 was made at the Blue Dolphin Seafood Bar and Restaurant located at 1166 Route 3 South, Gambrills, Maryland 21054.

15. On June 2, 2017, Special Agent Stull and I met with Blue Dolphin Manager Brian McCann who provided us a copy of the original receipt showing the charge being placed to LCDR Franco's Government VISA travel card. Video evidence was retrieved, which shows the same black female, wearing the same green colored camouflage T-shirt, entering the lobby of the restaurant, placing a carry out order, and paying for her purchase with what appears to be a silver-colored credit card, which is similar in appearance to a Government VISA Travel Card.

16. The fifth unauthorized transaction occurred at 11:25 am on Sunday, May 28, 2017, involved a purchase in the amount of \$5.46 that was made at the Starbucks counter located within the Target store at 2384 Brandermill Boulevard, Gambrills, Maryland 21054. A second unauthorized transaction was attempted at Target at 12:41 pm, but was declined.

17. Jamie Hall, Executive Team Leader with Assets Protection at Target, provided me with photographs and videos that show the black female, wearing the same green camouflage T-shirt that she was wearing the day before, stopping at both Starbucks and the Target check-out lines. The times and dollar amounts of her purchases coincide with the charges placed on LCDR Franco's Government VISA travel Card. Additionally, Hall provided photographs and videos of the black female wearing the green camouflage T-shirt departing Target and loading her bags

into a light blue 4-door sedan parked in one of the "handicapped" parking spaces in front of the store.

18. The sixth unauthorized transaction occurred at 1:03 pm on Sunday, May 28, 2017, where a purchase in the amount of \$9.63 that was made at Wendy's located at 16400 Harbour Way, Bowie, Maryland 20716. Special Agent Stull and I confirmed that there was no videotape evidence available from that location.

19. The final unauthorized transaction occurred at 4:57 pm on Sunday, May 28, 2017, where a purchase in the amount of \$1.00 was made at the Sunoco Gas Station located at 1400 Crain Highway, Bowie, Maryland 20716. Special Agent Stull and I confirmed that there was no videotape evidence available from that location.

20. On June 5, 2017, Special Agent William Stull and I met with Security Officer Ashley Green, an employee for Assured Protection, the contract security company responsible for security at the Waugh Chapel Towne Centre, the shopping center where Starbucks and Target are located, in Gambrills, Maryland. Green provided us with surveillance video from Sunday, May 28, 2017, showing the black female wearing the green camouflage T-shirt departing the Target parking lot in a blue four-door sedan and heading southeast toward the Towne Centre exit. The license plate number on the blue four door vehicle was Maryland "5CV2870."

21. A comparison of the video recovered from Shoppers, Giant, Starbucks and Target all appeared to show a black female making the purchases who bore a resemblance to LAQUETTE DARCELL DUNN, one of the individuals who had access to Pentagon Room 4B514 on Friday, May 26, 2017.

22. A further review of DUNN's Pentagon Swipe Access records for Friday, May 26, 2017, revealed that she departed the Pentagon via the Pentagon Corridor 2 Entrance at 2:34 pm, *some two hours* before the first fraudulent transaction was made at Shoppers.

23. A query of the Pentagon Parking System Database revealed that DUNN is cleared to park in the Pentagon's "handicapped" parking lot and that her vehicle license plate is Maryland "5CV2870."

24. On June 29, 2017, at 0900 hours, Special Agents Stull and Joseph Oppedisano met with DUNN in Room 4B514 of the Pentagon to conduct a voluntary noncustodial interview. Special Agent Stull nevertheless advised LAQUETTE DARCELL DUNN of her Miranda Rights, which she verbally waived. She also signed a Miranda Rights waiver form. During the interview, after Special Agent Stull went through all of the unauthorized charges to LCDR Franco's Government VISA Travel Card from Friday, May 26, 2017, to Sunday, May 28, 2017, DUNN confessed to taking LCDR Franco's card and making the unauthorized purchases over the Memorial Day Weekend. She stated that she "used the card to help a family in need" that she "made a one-time mistake" that "should have known better" and that she "would be willing to pay the money back."

III. CONCLUSION

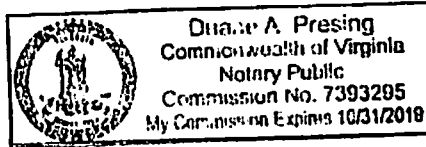
25. Based on the foregoing information, I believe probable cause exists to issue a summons to compel the appearance of LAQUETTE DARCELL DUNN, so that she may be made to answer to the charge that on or about May 26, 2017, on the Pentagon Reservation, within the Special Maritime and Territorial Jurisdiction of the United States, in the Eastern

District of Virginia, she did knowingly, intentionally and unlawfully steal and convert to her use and gain, a Government VISA travel credit card, issued by Citibank, that she used to charge goods and services between May 26, 2017, and May 28, 2017, with an aggregate total value of \$366.12, in violation of Title 18 CFR §641.



David Sokeck, Special Agent
Threat Management Unit
Pentagon Force Protection Agency

SUBSCRIBED AND SWORN
BEFORE ME ON THIS 23rd
DAY OF JANUARY, 2018



Notary Public